

EXHIBIT G-2

George J. Gerro (SBN 325168)
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Self-Represented

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, BURBANK COURTHOUSE

GEORGE GERRO, an individual,

Plaintiff,

vs.

BLOCKFI LENDING LLC, a Delaware
limited liability company; SCRATCH
SERVICES, LLC, a Delaware limited
liability company; and DOES 1 through
100,

Defendants.

) **CASE NO.: 20BBCV00308**
)
) **ASSIGNED FOR ALL PURPOSES TO:**
) **Honorable Frank M. Tavelman**
) **Department A**
)
)
) **STIPULATION TO DISMISS**
) **DEFENDANTS BLOCKFI LENDING,**
) **LLC; BLOCKFI, INC.; [PROPOSED]**
) **ORDER THEREON**

1 WHEREAS, this action was stayed due to the bankruptcy of Defendant BlockFi Lending
2 LLC (“BlockFi”);

3 WHEREAS, on August 19, 2024, Plaintiff George Gerro (“Gerro”) filed a request for
4 dismissal without prejudice of Defendant BlockFi Lending LLC (“BlockFi”), the only BlockFi
5 affiliated entity named in said action;

6 WHEREAS, on August 19, 2024, the above-entitled court entered dismissal of BlockFi;

7 WHEREAS, BlockFi requests that Gerro dismiss BlockFi with prejudice;

8 WHEREAS, the subject matter of the above-entitled action is still pending before the
9 United States Federal Court of Appeals for the Third Circuit, so dismissal with prejudice is not
10 intended to constitute *res judicata* of the claims contained herein;

11 **IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

12 1. BlockFi is dismissed with prejudice, but such dismissal shall not be claim preclusive.

13 2. BlockFi represents that BlockFi will not argue in any forum or tribunal that its dismissal
14 necessitates claim preclusion, and Gerro reasonably relies upon BlockFi’s representation.

15 3. No third-parties or privies of BlockFi may rely upon this dismissal as being claim
16 preclusive.

17 4. This stipulation shall not in any manner undermine the power, jurisdiction, or ability of
18 the United States Bankruptcy Court for the District of New Jersey, the United States District Court
19 of New Jersey, or the United States Court of Appeals for the Third Circuit to render appropriate
20 relief upon Gerro’s claims which are currently pending, or may be pending in the future, before
21 those courts. Said courts shall retain the power to abstain, defer, or otherwise allow this Court to
22 decide any remaining issues between the parties.

23
24 DATED: September __, 2024

HAYNES AND BOONE, LLP

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26 By: _____

27 Mark Erickson
28 Attorneys for Defendant BLOCKFI
LENDING, LLC

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DATED: September ____, 2024

By: _____
George J. Gerro
Self-Represented

**GOOD CAUSE APPEARING THEREFOR,
IT IS SO ORDERED.**

DATED: _____
HON. FRANK M. TAVELMAN
JUDGE OF THE SUPERIOR COURT